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Cc: Yeany, Philip[Yeany.Philip@epa.gov]
From: Letzkus, Mary
Sent: Mon 1/13/2014 4:25:28 PM
Subject: DC0000019 Permit Renewal
DC0000019 WA 2008 final BE.pdf

Hi Tom,

Just in case you thought I may have forgotten you.....I haven't. I am, however, working on the reissuance of the Aqueduct's NPDES permit. I have a couple of issues to relate. First, regarding the Aqueduct's request for a reduction of the aluminum permit limit for outfall 006. I've taken a long and hard look at this. I believe we can offer some relief, as you requested, e.g. increasing the average monthly limit from 4 mg/l to 6 mg/l **provided** that the discharge only occur one time in 3 years as the application suggests. If a second discharge were to occur the monthly average limit would revert to the 4 mg/l level. This would be based on the fact that significant improvements were made to the facility and that this is a discontinuous discharge.

Secondly, I've been talking to Christine Vaccarro, who has taken Julie Crocker's position at NMFS. She thinks, and I agree, that we will need a new Biological Evaluation to accompany the draft permit. To help move this along, would you please assign this to a member of your staff? I have attached a copy of the 2008 BE to this email. What I need is some information and data to describe the effect (change) of the discharges (or lack thereof) on living resources now as compared to back in 2008 when the permit was last reissued. I don't necessarily need someone to write the BE (although if you want to take a stab at it that's ok with me), but I do need some information which hopefully you have.

Also, it has been my understanding that the Aqueduct may (rarely) need to discharge from outfalls 002,003 or 004 in the rare event that the basins are drained and cleaned. By this I obviously don't mean a large discharge which no longer happens, just some O&M to clean residuals from the basins. Please advise if I am mistaken and this won't be necessary. If you need this coverage, please point me to where in the application that is covered, if it is not, please add that information as a cover letter or email to me so I can address it in the permit/fact sheet.

If there is anything else, I'll be in touch.

Hope you are well.

Best wishes.

Mary